

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

May 8, 2017

David J. Bradley, Clerk of Court

United States of America
v.
Vedas Rajivbhai ENGINEER
AKA: Ved

Case No.

H17-0712M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2, 2017 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 1341

Mail Fraud

This criminal complaint is based on these facts:

See Attached Affidavit of U.S. Treasury Inspector General for Tax Administration Special Agent Jessica Cipolla

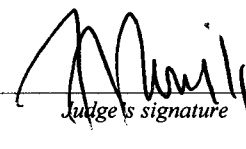
☒ Continued on the attached sheet.

Complainant's signature

Jessica Cipolla, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/08/2017City and state: Houston, Texas

Judge's signature

U.S. Magistrate Judge

Printed name and title

MARY MILLOY
United States Magistrate Judge

I, Jessica Cipolla, Special Agent with the Treasury Inspector General for Tax Administration (TIGTA), being duly sworn state: I make this affidavit with personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents and information gained through my training and experience. This affidavit does not contain all facts developed during the underlying investigation and is being submitted for the limited purpose of establishing probable cause in support of this criminal complaint.

TIGTA promotes the economy, efficiency, and effectiveness in the administration of the internal revenue laws. It is also committed to the prevention and detection of fraud, waste, and abuse within the Internal Revenue Service (IRS) and related entities. I have been a Special Agent since July 2012 after successfully completing the Criminal Investigator Training Program at the Federal Law Enforcement Training Center. As a TIGTA Special Agent I have received training, participated in, or conducted criminal investigations related to computer fraud, wire fraud, bank fraud, and false impersonation of IRS employees, and other criminal violations within TIGTA's jurisdiction.

On or about May 2, 2017, ALLEN ESTEP, a small business owner in Shreveport, LA, reported that he was contacted by individuals claiming to be IRS employees. ESTEP received a call from (xxx) xxx-7181 from an individual claiming to be an IRS agent. ESTEP called that number back and an individual answered the phone claiming to be the IRS. ESTEP was directed to overnight a \$25,000 cashier's check via United Parcel Service (UPS) to Ryan PORTOCARRERO at 9311 Parkmore Drive Houston, Texas 77095.

ESTEP sent a \$25,000 cashier's check with guaranteed delivery by 10:30 AM on May 2, 2017. ESTEP reported he sent a \$25,000 cashier's check to RYAN PORTOCARRERO, Houston, TX, whom ESTEP was told was an IRS Attorney.

TIGTA Special Agents witnessed the United Parcel Service (UPS) deliver a package to 9311 Parkmore Drive Houston, Texas 77095. The UPS driver placed the package on the ground at the front door of the residence, rang the doorbell, and returned to his delivery truck. TIGTA previously received information approximately one (1) hour earlier that ALLEN ESTEP sent a \$25,000 cashier's check to PORTOCARRERO at 9311 Parkmore Drive Houston, Texas 77095, that was scheduled to be delivered by 10:30 AM on May 2, 2017. ESTEP fell victim to IRS impersonators and believed the \$25,000 was to satisfy a tax liability he owed the IRS. ESTEP believed that PORTOCARRERO was an IRS Attorney.

The package was addressed to PORTOCARRERO 9311 Parkmore Drive Houston, Texas 77095-4667. The package was sent by ESTEP. The package bore UPS tracking number 1Z7F93E80132589665.

At the time the package was delivered, TIGTA observed a male sitting in a dark gray Honda sedan parked approximately 1-2 houses down from 9311 Parkmore Drive. TIGTA Special Agents approached the individual and identified him as VEDAS ENGINEER.

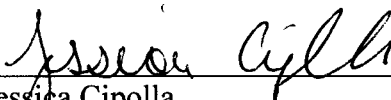
ENGINEER gave TIGTA Special Agents consent to search his vehicle. Special Agents found multiple bank folders not in ENGINEER's name. The folders indicated that checking accounts were recently opened in three other individual's names. Special Agents have talked to two of those individuals, who admitted they worked for ENGINEER in a fraudulent scheme.

ENGINEER told TIGTA Special Agents the money was proceeds for a loan that he was attempting to obtain via PORTOCARRERO. ENGINEER told TIGTA Special Agents that he would pay PORTOCARRERO \$500. PORTOCARRERO reported ENGINEER recruited him to pick up a cashier's check for a loan.

TIGTA Special Agents requested and received consent from ENGINEER to image search his phone. On his phone, they found images of multiple deposit slips from various bank deposit numbers (only one account has been verified as belonging to ENGINEER). ENGINEER had google searched what happens when a cashier's check is cashed by the wrong person or a person with a different name. ENGINEER google searched someone who was recently arrested for illegally endorsing cashier checks. ENGINEER searched the name of three to four associates of this scam and searched "IRS scam." One of ENGINEER'S known associates admitted she worked for ENGINEER as a runner in a scheme to cash checks to other people for himself. Finally, ENGINEER had googled his own name with "IRS Scam."

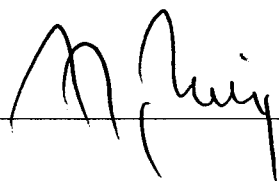
ENGINEER agreed to meet with his attorney and TIGTA Special Agents on Monday May 8, 2017, at 1:30 p.m. At approximately 11:30a.m. the reporting Special Agent received information that ENGINEER was attempting to leave the country via Air India flight 126 out of Chicago O'Hare airport, that flight has been cancelled and he has not yet arranged a new flight. ENGINEER's native country is India.

Based upon the information contained in this affidavit, there is probable cause to believe VEDAS ENGINEER is in violation of Title 18, USC Section 1341, Mail Fraud.



Jessica Cipolla
Special Agent, TIGTA

Signed and sworn to before me on May 8th, 2017, and I find probable cause.



Mary Milloy
U.S. Magistrate Judge